



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
IDAHO OPERATIONS OFFICE
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April 1, 2015

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USDA, U.S. Forest Service
Caribou/Targhee National Forest
1405 Hollipark Drive
Idaho Falls, Idaho 83401

Re: Request to Update and Identify Potential ARARs and TBCs Relevant to the Alternatives Contemplated for the Ballard Mine Site.

All,

The purpose of this letter is to formally request that each support agency identify and communicate their respective potential applicable or relevant and appropriate requirements (ARARs) that may be relevant to the alternatives contemplated for the Ballard Mine Site and other P4 sites. This request is being made to ensure consistency with 40 CFR §300.515(d) which states that "...the lead and support agencies shall identify their respective potential ARARs and communicate them to each other in a timely manner, i.e., no later than the early stages of the comparative analysis...." The participating agencies may also identify other pertinent advisories, criteria, or guidance to be considered (TBCs) at this time.

ARAR identification is an iterative process during development of the RI/FS and is refined as the project advances. You will recall that the final workplan for this project (dated May 2011) included a preliminary identification of potential ARARs. The draft Technical Memorandum recently submitted by P4 includes an update to this list of potential ARARs. This is an appropriate time to refine potential ARARs and TBCs as the RI report is complete, P4 has initiated screening of technologies and process options, and will be developing remedial action alternatives in the coming months.

In providing information on potential ARARs, please identify and provide a summary of the ARAR, include a citation, and indicate whether you believe a specific requirement is applicable or relevant and appropriate. As necessary, refer to 40 CFR §300.400(g) for direction on determination of ARARs. I am requesting that you provide this information within 30 days. (Note that comments on Tech Memo #1 are due sooner than that. However, we can provide P4 with additional information on ARARs as they are identified.)

Please contact me if you have questions. I can be reached at 208-378-5763 or electronically at tomten.dave@epa.gov.

Sincerely,

//s//

Dave Tomten
Remedial Project Manager

cc:

Bob Blaesing, BIA (electronic version only)
Dennis Smith, CH2MHill (electronic version only)
Gary Billman, IDL – Pocatello (electronic version only)
Charles Allbritton, EPA Records Center (electronic version only)